

# Exhibit A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

BABY DOE, *et al.*

*Plaintiffs,*

V.

JOSHUA MAST, *et al.*

*Defendants,*

and

UNITED STATES SECRETARY OF  
STATE ANTONY BLINKEN, *et al.*,

*Nominal Defendants.*

Case No. 3:22-cv-49-NKM

## DEFENDANTS JOSHUA AND STEPHANIE MAST'S THIRD INTERROGATORIES TO PLAINTIFFS JANE AND JOHN DOE

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, and the applicable Local Rules of the Western District of Virginia, Defendants Joshua and Stephanie Mast, by counsel, submit the following Interrogatories to Plaintiffs Jane and John Doe. Plaintiffs' responses are due as required by the Federal Rules of Civil Procedure.

## DEFINITIONS AND INSTRUCTIONS

1. The “Action” means the above-captioned action.
2. The phrases “You,” “Your,” and “Plaintiffs” each mean or refer to the persons identified in the Complaint as Jane and John Doe, as well as their agents and attorneys, and any other Person acting on their behalf.
3. “Complaint” means the Amended Complaint filed by Plaintiffs in this Action on October 28, 2022.

4. “Person” means the plural, as well as the singular, and includes natural persons, corporations, public corporations, governments, governmental agencies, partnerships, groups, firms, associations, or other organizations or entities of any description.

5. A request to “identify” or its derivatives (*i.e.*, “identity”), when used in reference to a natural person, shall be interpreted as a request to state in the answer in each instance:

- a. The person’s full name and present or last known business and home address, telephone number, and email address, and
- b. The person’s occupation or business (including the name and address of the person's present employer) and position.

6. The term “identify,” when used with respect to any document or tangible thing, shall mean to Identify its location, its owner, and, if it is a document, to Identify the author, recipient, date, and bates number.

7. When asked to “describe” with particularity or “explain in detail” or “describe in detail” an act, occurrence, event, transaction or communication, the description or explanation should include, but is not limited to, the following:

- a. The date, time, and place;
- b. The name of each person present, whether or not a participant;
- c. The nature, substance and subject matter with sufficient specificity to identify relevant aspects; and
- d. The explanation of description should reference underlying facts rather than ultimate facts or conclusions of fact or law.

8. Your response to each discovery request is to include the identification of all information and documents available to you, including information and documents within the actual or constructive possession of Your attorneys, investigators or other agents.

9. For purposes of these Interrogatories, the word “and” includes the disjunctive “or” and the word “or” includes the conjunctive “and.” Words in the singular shall be interpreted to include both the singular and the plural. A masculine, feminine, or neuter form of a word shall be interpreted to include the other genders. The use of any tense of any verb shall be interpreted to include all other tenses.

10. If You assert that a privilege limits Your obligation to provide a response to any Interrogatory, including, but not limited to, those requesting descriptions of document(s), Your objection should set forth: (1) the nature of the privilege asserted (*i.e.*, attorney-client, etc.); (2) a sufficient description of the facts upon which You base Your objection to apprise the Court of Your entitlement to the claim; and (3) the date and place of any document’s creation along with the document’s drafter, the identity of any intended recipients, and a brief description of its substantive contents.

### **INTERROGATORIES**

13. Identify all persons with knowledge of, or information relevant to, the video referred to by John Doe in Does\_00012951, including any information regarding the creation, production, dissemination, format, past or current locations, and number of copies along with any other information in your possession related to the video.

14. Describe, in detail, how you learned about the video described by John Doe in Does\_00012951 and all details you know about that video, including who provided you with this information and when, where, and how you ever viewed the video.

Dated: January 26, 2023

Respectfully submitted,

/s/ Michael Francisco  
Michael Francisco  
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